

## REMARKS

### Claim Status:

Claims 1-12, 14-25 and 27-51 remain pending in the present application. Claims 21-24 and 30-51 remain withdrawn from consideration.

Claim 25 is amended without prejudice by removing the term “authorized”.

Claim 12 is amended without prejudice to bring aspects of the preamble (anonymously verifying an age or characteristic) into the body of the claim.

### Formal Rejections

Claim 25 was rejected because it recited the term “authorized”. We thank the Examiner for pointing out the extraneous word. Claim 25 is amended by removing the term “authorized”.

We ask that the formal rejection of claim 25 be removed.

### Art-Based Rejection

Claims 25 and 27-29 are rejected as being anticipated by Wu (U.S. Patent No. 6,748,533). Claims 1-12 and 14-20 are rejected as being unpatentable over Wu in view of Moskowitz (U.S. Patent No. 7,159,116).

We respectfully traverse these rejections.

#### *Claim 25 in view of Wu.*

It is well settled that in order to establish a *prima facie* case of anticipation, each and every element of the claimed invention, arranged as required by the claim, must be found in a single prior art reference, either expressly or under the principles of inherency. *See generally*, In re Schreiber, 128 F.3d 1473, 1477 (Fed. Cir. 1997); Diversitech Corp. v. Century Steps, Inc., 850 F.2d 675, 677-78 (Fed. Cir. 1988); Lindemann Maschinenfabrik GMBH v. American Hoist and Derrick, 730 F.2d 1452, 1458 (Fed. Cir. 1984).

Wu does not anticipate claim 25 because it does not include (either expressly or inherently), e.g., comparing data corresponding to the second field with the reduced-bit

representation to verify an age level of the document, in combination with its other claim elements.

The Office Action cites Wu at col. 5, lines 1-34, and col. 9, lines 1-22 to meet the above features.

We disagree.

Indeed, we do not see any mention of verifying an age level of the document at the cited passages.

Claim 25 should be allowed over Wu.

(Other deficiencies of the Wu document need not be belabored at this time, but we reserve our right to do so if needed.)

*Claim 27 in view of Wu.*

Claim 27 recites storing the data corresponding to the second field in a data repository *to evidence examination of the identification document*.

Wu is cited at Col 7, lines 35-37 and Col. 4, lines 48-55 to anticipate these features.

We disagree.

For example, Col 4 discusses verifying the legitimacy of an article against forgery. And the Col. 7 passage discusses what kind of articles can be protected against forgery (e.g., a credit card, driver's license, etc.).

Neither of the cited passages, however discuss *storing data to evidence examination of the identification document*.

Claim 27 should be allowed over Wu.

*Claim 1 in view of Wu and Moskowitz.*

Claim 1 recites – in combination with other features – ***verifying a bearer's age*** ***when***: i) the first digital data indicates that the bearer is at least as old as a predetermined age, and ii) the second digital data and the third digital data correspond.

Both conditions i and ii must be satisfied in order to *verify a bearer's age*.

Wu at Col. 7, lines 20-28 mentions the term “Birth date” (line 21) but says nothing of verifying a bearer’s age when first digital data indicates that the bearer is at least as old as a predetermined age.

And while Wu at Col. 5, lines 14-33 and Col. 9, lines 1-22 may discuss verifying the legitimacy of an article, neither passage discusses *verify a bearer’s age* when second digital data and the third digital data correspond.

Therefore, even if combined as suggested, Wu and Moskowitz would not provide a method or system to verify a bearer’s age when: i) the first digital data indicates that the bearer is at least as old as a predetermined age, and ii) the second digital data and the third digital data correspond.

Claim 1 stands ready for allowance.

*Claim 12 in view of Wu and Moskowitz.*

Amended claim 12 recites – in combination with other features –determining, based on the first set of information, the person’s age or age level, *wherein the act of determining protects the anonymity of the person in possession of the identification document.*

The Wu document is cited at col. 7, lines 20-28 and Col. 7, line 65 – Col. 8, line 3 as meeting the act of determining. See the Office Action at page 13, lines 14-15. These passages envision information pertaining to the person’s identify (e.g., person’s fingerprint and ID number). Surely, this does not *protect the anonymity of the person in possession of the identification document* as recited in claim 12.

Claim 12 stands ready for allowance.

*Claims 14 and 15 in view of Wu and Moskowitz.*

Claim 14 recites a second set of information embedded in the identification document of claim 12. The second set of information corresponds to a third set of information that is printed on the identification document. The second set of information comprises an *index for accessing a data repository.*

Regarding the features of claim 14, Wu at Col. 7, line 53 – Col. 8, line 3, is cited in the Office Action, but this passage discusses storing different information (i.e.,

identification portion, name of country or state, photograph, passport number, name of person, issuance information, personal particulars and biometric data) and does not mention a second set of information comprising an *index for accessing a data repository*.

Claim 14 should be allowed.

Claim 15 recites that the *index comprises a hash* of the third set of information that is printed on the identification document. (Recall from claim 14 that the index is for accessing a data repository.) The cited Wu passage (col. 8, lines 22-30) discusses encrypting a biometric invariant feature with a hash. But this hash is not understood to be an index for accessing a data repository. And there was no clarification in the Office Action per this feature, despite our similar position in our last Amendment.

Claim 15 stands ready for allowance as well.

*Claim 18 in view of Wu and Moskowitz.*

Claim 18 recites the first set of information comprises two or more random bits. The Office Action refers to the “generate random pattern” step of Wu’s Fig. 6 as teaching these features. See page 16 of the Office Action, under “As per claim 18:”. We respectfully disagree.

Claim 18’s “first set of information” is like a message, and if mapped to Wu’s Fig. 6 would be more like the biometric information 600 or the other appending information 602. Information 600 and 602 are encrypted and provided to a random pattern generator. But, as a result, the biometric information 600 and the other appending information 602 do not then include “two or more random bits”. We submit that the random pattern is more akin to a watermark carrier signal, and not to an actual message.

Thus, Wu is not understood to teach or suggest adding two or more random bits to a first set of information.

Claim 18 stands ready for allowance.

*Claim 20 in view of Wu and Moskowitz.*

Claim 20 recites – in combination with other features – that a combination of random bits and the date of birth decrease likelihood of overlapping birth dates, while maintaining an anonymous audit clue.

We see no mention of “maintaining an anonymous audit clue,” in combination with the other claim features, in the cited passages (see the Office Action, page 16, under “As per Claim 20:”, citing Wu at col. 11, lines 15-18 and Fig. 6).

Indeed, the cited Wu passage at col. 11, lines 15-18 (and fig. 6), says nothing regarding maintaining an anonymous audit clue, in combination with the other claim features.

Claim 20 stands ready for allowance.

*Remaining Claims*

We respectfully submit that the remaining claim recite patentable combinations.  
Reconsideration is requested.

Conclusion

We respectfully submit that the application is in condition for allowance.  
Nevertheless, the Examiner is invited to telephone the undersigned at 503-469-4685 if  
any questions remain.

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Respectfully submitted,

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